



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NEW ENGLAND – REGION 1

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November 15, 2018

Chinny Esakkiperumal
Olin Corporation
3855 North Ocoee Street
Suite 200
Cleveland, TN 37312

Subject: Response to Notifications Regarding Plant B – Olin Chemical Superfund Site

Dear Mr. Esakkiperumal,

I am writing you in response to several notifications EPA has received associated with the Plant B remediation system as follows:

- Temporary Plant B Shutdown Notification, June 29, 2018
- Plant B Shutdown Monitoring, August 23, 2018
- Plant B Shutdown – Installation of Absorbent Socks, September 14, 2018

Olin first began operation of the Plant B remediation system in 1981 to prevent reoccurrence of LNAPL seepage and related sheens to the East Ditch. Plant B was in operation at the time that the Olin Chemical Superfund Site (Site) was finalized on the National Priorities List in April of 2006. Continued operation of the Plant B remediation system is required under terms of the July 2007 Administrative Settlement Agreement and Order on Consent (AOC) through the RI/FS Statement of Work (SOW). The SOW required Olin to prepare a work plan to document the requirements for continued operation and monitoring of the Plant B remediation system and other items. In response, on July 25, 2007, Olin submitted a Draft Interim Response Steps Work Plan (IRSWP). The draft IRSWP included a proposal by Olin to shut-down the Plant B remediation system. EPA and other stakeholders expressed concern that a shut-down could result in the release of residual LNAPL to the adjacent East Ditch as well as potential uncontrolled migration of dissolved constituents. EPA did not approve the shut-down. However, EPA did subsequently approve a step-down pump test which would allow for a measured reduction in the extraction rate as long as conditions did not worsen (i.e., no breakout of LNAPL observed in the East Ditch). Details regarding the proposed step-down pump test, and continued operation and maintenance of Plant B, are documented in the Final IRSWP, dated August 8, 2008. The step-down pump test was never implemented and instead Olin suspended operation of Plant B in June 2018.

Plant B consists of three extraction wells and an associated treatment system. The wells pump continuously to maintain a constant drawdown of the water table but the treatment system operates in a batch-mode and effluent is discharged intermittently on-site into the upper West Ditch. Interim

treatment and monitoring requirements were consistent with the Remediation General Permit (RGP).

On June 26, 2018, Olin received authorization under the reissued RGP from EPA Region 1's Office of Ecosystem Protection (OEP). The authorization contains an expanded list of monitoring requirements. In a letter to EPA dated June 29, 2018, Olin notified EPA that their laboratory could no longer meet the required turnaround times for the expanded list of regulated chemicals under the new RGP authorization and suspended operation of Plant B.

In a subsequent letter dated August 23, 2018, Olin notified EPA of its intention to implement additional monitoring of the Plant B treatment system while operation is suspended to better understand the implications of the June 26, 2018 RGP authorization. In doing so, Olin indicated it would implement appropriate portions of the USEPA-approved step-down pump test outlined in the Final IRSWP and collect relevant observation data at the approved frequency, as applicable. Olin also indicated that water level measurements and the potential visual presence of an LNAPL-related sheen in the surrounding wells and the East Ditch have been monitored since the system was shutdown.

Another letter dated September 14, 2018, notified EPA of Olin's intention to install absorbent socks at select monitoring wells as part of the ongoing Plant B treatment system shutdown monitoring/evaluation. The absorbent socks would be deployed at GW-23, P-5, IW-2, and IW-11 where a sheen of oil has been observed historically.

It is important to note that the operation, monitoring, and maintenance of the Plant B remediation system are governed by the AOC and the workplans approved pursuant to the AOC. If changes are needed to address implementation issues, including discharge limits and monitoring requirements, a revised workplan must be submitted to EPA's Office of Site Remediation and Restoration (OSRR) for review and the changes shall not be implemented until written approval is received. EPA OSRR is the lead office for all regulatory issues associated with the Site and will coordinate changes to the discharge limits and monitoring requirements with other EPA offices as appropriate to ensure that the cleanup operations at the Site continue to comply with CERCLA. It is also important to note that Plant B has operated as a containment system for not only the LNAPL but also dissolved-phase ammonia, BEHP and other organic compounds in groundwater.

EPA does not approve of the suspension of Plant B at this time. As noted in EPA's September 25, 2018 comments on the Draft Feasibility Study, EPA anticipates that remedial alternatives may need to be developed for this area as part of the remedy at the Site. A final decision on the continued operation of Plant B, or other appropriate response action, will then be established as part of the cleanup plan for the Site.

Within two weeks from receipt of this letter, Olin shall restart Plant B and operate it as a temporary measure consistent with the discharge limits and monitoring requirements of the June 26, 2018 RGP authorization No. MAG910074, except that the sample turnaround times for the parameters listed in Table 6 are waived. In addition, within two weeks from receipt of this letter, Olin shall submit a work plan as an addendum to the Final IRSWP to include a proposal for the continued operation and maintenance of Plant B, as well as an associated groundwater, surface water and discharge monitoring program to EPA OSRR. The CERCLA Remedial Project Manager (RPM) will coordinate with the permit writer to ensure the proposed discharge monitoring program is acceptable. The RPM has spoken

with the permit writer who indicates that upon EPA approval of the work plan addendum, a notice of termination of the RGP will be issued.

In addition, if Olin would like to evaluate other alternatives for controlling this release such as the use of absorbent socks, Olin shall submit a workplan for an evaluation for those alternatives. The evaluation must include a range of alternatives that address the dissolved-phase groundwater COCs in this portion of the Site, not just LNAPL.

Please let me know if you have any questions.

Sincerely,



James M. DiLorenzo
Remedial Project Manager
USEPA Region 1 - New England

Cc: Bob Cianciarulo, EPA
Lynne Jennings, EPA
Chris Smith, EPA
Shawna Little, EPA
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